

**The Sultz
Law Group P.C.**

A Complex Litigation & Trial Practice

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March 16, 2023

MEMORANDUM ENDORSED

FILED VIA ECF

Judge Kenneth M. Karas
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Catalano v. Lyons Magnus LLC and TRU Aseptics, LLC*
Index No: 7:22-cv-06867-KMK

Your Honor:

We represent Plaintiff in the above captioned matter. We write, along with counsel for Plaintiffs in the related matters,¹ to inform the Court that the parties in this action and in the related matters have agreed in principle upon key terms for a proposed class-wide settlement. Accordingly, Plaintiff requests that the Court terminate all pending deadlines in this action. With the Court's permission, Plaintiff intends to file an amended consolidated complaint, which will include the other related matters within thirty (30) days of the date of this letter. Plaintiff's counsel also respectfully requests permission to file a Motion for Preliminary Approval of Class Action Settlement and Class Certification within sixty (60) days from the date of this letter. Plaintiff's counsel has spoken with Defendants' counsel and Defendants agree with Plaintiff's requests.

Please kindly advise should Your Honor have any further questions.

Very truly yours,

THE SULTZER LAW GROUP P.C.

Jason P. Sultz

¹ The related matters include:

Karen Radford, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:23-cv-00088 (E. D. Ca.)
Christy Deringer, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-00968 (E.D. Ca.)
Tomoko Nakanishi, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1: 22-cv-06899 (N. D. Ill.)
Veronica Pereya, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-06622 (N. D. Ill.)
Roberta Sinco, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-01479 (E. D. Ca.)
Barbara Speaks, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-01043 (M.D. N.C.)
Edmond Dixon, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 2:22-cv-04039 (D. S.C.)